#### THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Richmond Division

JOHN KINLAW,	)
Plaintiff,	) )
v.	Civil Action No. 3:17-cv-00772-REP
CHARLES NWAOKOCHA, et al.,	)
Defendants.	)

#### JURY VERDICT FORM

## **COUNT I - NEGLIGENCE**

**Question 1:** Do you find that John Kinlaw has proven by a preponderance of the evidence that Dr. Nwaokocha fell below the standard of care in rendering care and treatment to John Kinlaw during November 19, 2016 through December 10, 2016?

 YES	NO

If you answered "YES" to Question #1, proceed to Question #2.

If you answered "NO" to Question #1, you need not answer any other question on this form. Please have the Foreperson sign at the end of this form.

**Question 2:** Do you find that John Kinlaw has proven by a preponderance of the evidence that the care and treatment provided by Dr. Nwaokocha to John Kinlaw during November 19, 2016 through December 10, 2016 was a proximate cause of any injury or damages to John Kinlaw?

If you answered "YES" to Questions ## 1 and 2, proceed to Question # 3.

If you answered "NO" to Question # 2, you need not answer any other question on this form. Please have the Foreperson sign at the end of this form.

# **COUNT II - GROSS NEGLIGENCE**

**Question 3:** Do you find that John Kinlaw has proven by a preponderance of the evidence that Dr. Nwaokocha provided care and treatment to John Kinlaw at any time during his incarceration after his fall on November 19, 2016 with gross negligence?

YESNO	
If you answered "YES" to Question # 3, proceed to Question # 4.	
If you answered "NO" to Question # 3, do not answer Question # 4, but proceed to question #	· 7.
<b>Question 4:</b> Do you find that John Kinlaw has proven by a preponderance of the evidence grossly negligent care and treatment provided by Dr. Nwaokocha to John Kinlaw during incarceration after his fall on November 19, 2016 was a proximate cause of any injury damages to John Kinlaw?	his
YESNO	
If you answered "YES" to Questions # 4, proceed to Question # 5.	
If you answered "NO" to Question # 4, do not answer Question 5 proceed to question # 7	

# **COUNT III - WILFULL AND WANTON NEGLIGENCE**

8 after answering Question # 7.

**Question 5:** Do you find that John Kinlaw has proven by a preponderance of the evidence that Dr. Nwaokocha provided care and treatment to John Kinlaw at any time during his incarceration after his fall on November 19, 2016 in a manner that was willful and wanton?

YES	NO
If you answered "YES" to Question # 5, proceed to	Question # 6.
If you answered "NO" to Question # 5 do not answ	er Question # 6, but proceed to Question # 7.
Question 6: Do you find that John Kinlaw has pr willful and wanton care and treatment provided be incarceration after his fall on November 19, 20 damages to John Kinlaw?	by Dr. Nwaokocha to John Kinlaw during his
YES	NO
If you answered "YES" to Question #6, proceed to	Question # 7 and then Question # 8.
If you answered "NO" to Question #6 proceed to Q	Question # 7, but do not proceed to Question #

## **DAMAGES**

*If you answered "YES" to at least Questions ## 1 and 2, proceed to question 7.* 

If you answered "NO" to Questions ## 1 or 2, you need not answer any other question on this form. Please have the Foreperson sign at the end of this form.

**Question 7**: What amount of compensatory damages do you find Plaintiff John Kinlaw has proven by a preponderance of the evidence was proximately caused by Dr. Nwaokocha's negligence?

Amount of damages:	
with interest from(month/date/year)	
without interest	
If you answered "YES" to Questions ## 1, 2,	3, 4, 5, and 6, proceed to question 8.
If you answered "NO" to any Question betwe have the Foreperson sign at the end of this fo	een ## 1 and 6, do not answer Question # 8. Please orm.
	mages do you find John Kinlaw has proven by a scause of Dr. Nwaokocha's treatment or care of John
Amount of punitive damages:	
	Foreperson's Printed Name
	Foreperson's Signature
	Date